

**DECLARATION OF GUY S. LIPE**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

<b>CONNECTICUT BANK OF COMMERCE,</b>	§	
<b>Plaintiff,</b>	§	
<b>v.</b>	§	
<b>THE REPUBLIC OF CONGO</b>	§	
<b>Defendant,</b>	§	<b>CIVIL ACTION No. 05-762 SLR</b>
<b>and</b>	§	
	§	
<b>CMS NOMEKO CONGO INC.,</b>	§	
	§	
<b>Garnishee.</b>	§	

**DECLARATION OF GUY S. LIPE IN SUPPORT OF CMS NOMEKO'S FEE PETITION**

Guy S. Lipe declares the following:

1. My name is Guy S. Lipe. I am over the age of twenty-one (21) years and am fully competent to make this Declaration. I am a partner with the law firm of Vinson & Elkins L.L.P. I submit this Declaration in support of the motion for reimbursement of attorneys' fees and costs that CMS Nomeco is filing in this action. I have personal knowledge of the facts stated herein and they are true and correct. The Declaration and its attachments set forth the fees and costs incurred by my law firm in defending CMS Nomeco in this action.

2. I am a 1983 graduate of the University of Texas School of Law and have been licensed to practice law in the State of Texas since November 1983. Since November 1983, I have engaged in a commercial litigation practice with the law firm of Vinson & Elkins L.L.P. Since the mid-1990's, a substantial portion of my practice has related to the handling of litigation matters involving foreign parties. In addition to this case, the cases involving Af-Cap, Inc. in the Western District of Texas and Fifth Circuit, and the NUFI case in the Northern District of Texas, relating to the Congo, I have handled other cases involving substantial issues arising under the

Foreign Sovereign Immunities Act, 28 U.S.C. § 1602 *et seq.* See, e.g., *In re China Oil and Gas Pipeline Bureau*, 94 S.W.3d 50 (Tex. App.—Houston [14th Dist] 2002, orig. proceeding).

3. I am lead counsel for CMS Nomeco Congo Inc., The Nuevo Congo Company, and Nuevo Congo Ltd. (“the Garnishees”) in the above-captioned case and related proceedings. I have been in charge of the representation of the Garnishees since inception of the case and have performed or overseen all legal work performed by Vinson & Elkins L.L.P. on behalf of the Garnishees in connection with these proceedings. The other Vinson & Elkins lawyers who have worked on this matter are identified in the spreadsheet attached as Exhibit 1.

4. Acting through a centralized committee, my law firm sets standard hourly rates for each lawyer and paralegal in the firm, and such rates are normally adjusted as of January 1 each year. That committee evaluates the reasonableness and appropriateness of the rate for each lawyer based on the facts and circumstances applicable to that lawyer. The hourly rates for each of the lawyers that have worked on this matter are reflected in the spreadsheet attached hereto as Exhibit 1.

5. I am familiar with all of the legal work performed in these proceedings by Vinson & Elkins lawyers. I have reviewed the time entries for attorneys who have worked on matters relating to these proceedings and I have identified the time entries that relate to the defensive efforts relating to the writ of garnishment issued against CMS Nomeco (and related entities in other proceedings), in this Court and in other jurisdictions in related proceedings, as well as the preparation of this fee application. Exhibit 1 to this Declaration contains only those time entries that include time spent in defending against this action. We have removed time entries in which all of the time relates to proceedings in other Courts or not pertaining to this specific action. For entries which include time for multiple proceedings, we have included in the

amounts for which recovery is sought in this case only the time attributable to work on this case. The work of the Vinson & Elkins L.L.P. attorneys reflected on Exhibit 1 was necessary and proper in defending CMS Nomeco against the writ of garnishment issued in this proceeding and in preparing this fee application. To date, the amount of attorneys' fees billed by Vinson & Elkins for the work reflected on Exhibit 1 to this Declaration is \$284,707.50.

6. I am familiar with the customary and reasonable charges for services rendered by attorneys in a case of this type. In my opinion, the billing rates for each of the attorneys that worked on this matter at Vinson & Elkins L.L.P. are reasonable for the work performed. The number of hours of work claimed for the various tasks involved was reasonable and necessary for the representation of the interests of CMS Nomeco in this case considering that (1) the time and labor required was great, (2) the novelty and difficulty of the questions presented in this case was high, (3) the skill required to perform the legal services properly was high, due to the complex issues presented, (4) the fees charged are customary in the relevant market for this level of litigation, (5) the fee is based on a fixed hourly rate, (6) time limitations were often imposed by the circumstances of the litigation, (7) the amount claimed was substantial, and a positive result (dissolution of the writs of garnishment) was obtained, and (8) I am experienced in matters involving the Foreign Sovereign Immunities Act and the other issues involved in this case. Considering all of these factors, it is my opinion that the sum of \$284,707.50 is a reasonable and necessary attorney's fee for the work performed by Vinson & Elkins in the representation of the interests of CMS Nomeco in contesting the writ of garnishment issued in these proceedings.

7. I also am familiar with the expenses associated with work by Vinson & Elkins lawyers that have been incurred in these proceedings. Attached hereto as Exhibit 2 is a

summary of the expenses incurred in connection with CMS Nomeco's defense against the writ issued in this proceeding. Those expenses total \$16,886.07. In my opinion, those expenses were reasonable and necessary in the defensive efforts relating to the writ of garnishment issued in these proceedings and the preparation of this fee application.

8. The fees and expenses described above do not include amounts relating to fees and expenses that may be incurred in proceedings arising out of any opposition to the fee application supported by this Declaration. I will supplement this Declaration with regard to any additional work and expenses that are required in connection with such opposition, including but not limited to discovery.

9. In the event Plaintiff appeals an award of attorneys' fees by this Court, CMS Nomeco will incur additional attorneys' fees in connection with that appeal. I have personally handled numerous appeals from Federal Courts and am familiar with the services that are required in handling such an appeal and with the reasonable and customary charges associated with such an appeal. It is my opinion that a reasonable and necessary attorney's fee for handling an appeal of an award of attorneys' fees and costs in this case would be approximately \$50,000.

10. Attached as Exhibits 1 and 2 hereto are spreadsheets itemizing the fees and expenses incurred by CMS Nomeco in defending against this action. Exhibits 1 and 2 were prepared utilizing the information in Vinson & Elkins L.L.P.'s billing systems concerning fees and expenses charged or to be charged to CMS Nomeco for this matter, which billing systems and records are kept in the ordinary course of the firm's business.

11. Exhibit 1 is a summary of time entries made by Vinson & Elkins attorneys who have worked on the above-captioned and numbered case on behalf of CMS Nomeco, from

2005 to the present. The entries relating to work performed by attorneys which are summarized in Exhibit 1 hereto were prepared by the individual attorneys and were entered into Vinson & Elkins L.L.P.'s computer system in the ordinary course of business at or near the time that the work was performed. It is the regular practice of Vinson & Elkins attorneys to make such time entries and for those entries to be promptly entered into the computer system. The time entries for the work that I performed accurately reflect the work that I performed on this matter. The entries for the other attorneys reflected on Exhibit 1 represent work that was actually performed by those attorneys under my direction and supervision. Where a time entry made by me or another Vinson & Elkins attorney contained privileged matter, that privileged matter has been redacted from Exhibit 1 and a bracketed description of the subject of the privileged matter has been inserted.

12. With regard to expenses, the entries for expenses that are summarized on Exhibit 2 were entered into the Vinson & Elkins computer system either by persons with knowledge of the expenditure or based on information supplied by a person with such knowledge, at or near the time the expense was incurred. It is the regular practice of Vinson & Elkins L.L.P. to make such entries.

13. Except for charges and expenses for February 2007 and March 2007, CMS Nomeco has paid all of my firm's invoices in full.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct. Executed in Houston, Texas on March 23, 2007.

  
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GUY S. LIPE

**Exhibit 1**

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Fees Vinson Elkins

Date	TKPR Name	Base Amt	Ba Hrs	Amt Sought	Hrs Sought	Narrative
10/13/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Review letter from Al Cap's counsel regarding Al Cap Delaware writ of attachment; draft email to Roland Fox regarding strategy relating to same.
10/14/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Review writ of attachment; draft emails to Jason Powers and Duncan Grant regarding same; begin work on notice of removal and answer.
10/16/05	Lipe, Guy	\$850.00	2.00	\$850.00	2.00	Prepare notice of removal and answer to Delaware writ of attachment; draft email to Duncan Grant and Jason Powers regarding same.
10/21/05	Powers, Jason M.	\$650.00	2.00	\$650.00	2.00	Review revisions to Delaware garnishment papers; research and prepare law inserts for same.
10/26/05	Nunnally, Knox	\$300.00	0.50	\$300.00	0.50	Review removal status in Delaware case.
10/31/05	Powers, Jason M.	\$650.00	2.00	\$650.00	2.00	Review and comment on draft removal/answer pleadings.
11/1/05	Lipe, Guy	\$2,337.50	5.50	\$1,168.75	2.75	Review email from Roland Fox with proposed revisions to answer; prepare revised draft of answer; draft email to Roland Fox regarding same; review cases on [jurisdictional issues]; prepare revisions to notice of removal relating to [jurisdictional issues]; draft email to Roland Fox regarding same; multiple telephone conferences and email exchanges with Duncan Grant regarding answer and notice of removal, compilation of exhibits relating to same;
11/1/05	Powers, Jason M.	\$406.25	1.25	\$406.25	1.25	Prepare answer/removal documents for filing.
11/2/05	Powers, Jason M.	\$243.75	0.75	\$243.75	0.75	Collect attachments for Delaware answer.
11/9/05	Lipe, Guy	\$318.75	0.75	\$318.75	0.75	Review motion to remand Delaware action; research on timing issues; draft email to Duncan Grant regarding motion to remand; draft email to Roland Fox regarding same.
11/18/05	Lipe, Guy	\$850.00	2.00	\$850.00	2.00	Review exceptions to answer; exchange emails with Duncan Grant regarding same; telephone conferences with Duncan Grant regarding research necessary to address points in exceptions; review motion to remand; exchange emails with Duncan Grant regarding status of draft of response to motion to remand; telephone conference with Duncan Grant regarding same; work on response to motion to remand.
11/21/05	Lipe, Guy	\$2,125.00	5.00	\$2,125.00	5.00	Prepare response to motion to remand; review and revise motion for leave to file verification; prepare verification; telephone conferences and email exchanges with Duncan Grant regarding response to motion to remand and motion for leave to file verification; review draft of response to motion to remand; prepare revised draft of response to motion to remand; telephone conferences with Duncan Grant regarding revised draft; draft email to Roland Fox regarding draft of response to motion to remand.
11/21/05	Powers, Jason M.	\$81.25	0.25	\$81.25	0.25	Review draft remand and verification papers.
11/22/05	Lipe, Guy	\$850.00	2.00	\$850.00	2.00	Review comments on response to motion to remand; prepare revised draft of response; draft email to Roland Fox and Ellie Hodges regarding revised draft of response; compile exhibits for response to motion to remand; draft email to Duncan Grant regarding same; review additional comments on response to motion to remand; prepare revised draft; telephone conferences with Duncan Grant regarding revisions to draft.
11/23/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Telephone conference with Roland Fox regarding response to motion to remand; exchange emails with Duncan Grant regarding filing of response to motion to remand; exchange emails with Roland Fox and Duncan Grant regarding Bernard declaration for answer; review declaration.
11/30/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Review motion for summary judgment in Delaware action; draft email to Roland Fox regarding same.
12/1/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Review motion for summary judgment; exchange emails with Duncan Grant and Roland Fox regarding motion for summary judgment and possible cross motion; telephone conference with Duncan Grant regarding same.
12/3/05	Powers, Jason M.	\$81.25	0.25	\$81.25	0.25	Review reply in support of motion to remand.
12/5/05	Lipe, Guy	\$318.75	0.75	\$318.75	0.75	Review reply to response to motion to remand; review cases cited in reply; exchange emails with Duncan Grant regarding possible surrepley; telephone conference with Duncan Grant regarding same.



Fees Vinson Elkins

12/7/05	Lipe, Guy	\$1,487.50	3.50	\$637.50	1.50	[separate matter]; review AI Cap reply on remand issues; conduct research on new arguments raised by AI Cap; telephone conference with Duncan Grant regarding strategy in filing surrepley; prepare draft of surrepley; draft email to Ellie Hodges and Duncan Grant regarding surrepley.
12/8/05	Lipe, Guy	\$3,400.00	8.00	\$3,400.00	8.00	Review draft of motion for leave to file surrepley; prepare revisions to same; exchange emails with Ellie Hodges and Duncan Grant regarding same; prepare first draft of response to motion for summary judgment and cross motion for summary judgment; prepare draft of declaration of Maryse Bernard for same.
12/9/05	Lipe, Guy	\$2,125.00	5.00	\$2,125.00	5.00	Continue work on response to motion for summary judgment; review draft of notice of supplemental authority on attorney's fee issue; review AI Cap response to motion for leave to amend; exchange emails with Duncan Grant regarding same; draft email to Roland Fox regarding same; continue work on response to motion for summary judgment.
12/10/05	Lipe, Guy	\$1,275.00	3.00	\$1,275.00	3.00	Prepare revised draft of response to motion for summary judgment and cross-motion for summary judgment; draft email to Ellie Hodges regarding same.
12/12/05	Lipe, Guy	\$4,675.00	11.00	\$4,675.00	11.00	Conduct research on [issues related to Delaware garnishment]; continue work on response to AI Cap motion for summary judgment and cross motion for summary judgment in Delaware; telephone conferences with Duncan Grant and Ellie Hodges regarding response and cross motion; finalize draft of response and cross motion; prepare revised draft of Maryse Bernard declaration; draft email to Roland Fox and Ellie Hodges regarding draft of response and cross motion.
12/12/05	Powers, Jason M.	\$81.25	0.25	\$81.25	0.25	Review draft summary judgment response.
12/13/05	Lipe, Guy	\$4,250.00	10.00	\$4,250.00	10.00	Prepare for, participate in conference call with Roland Fox and Thompson & Knight lawyers; review Roland Fox regarding same; draft emails to Ellie Hodges and Andy Derman regarding same; identify issues and questions concerning [business records]; exchange emails with Ellie Hodges and Duncan Grant regarding same; review draft of reply to response to motion to add verification; prepare revised draft of reply; email exchanges with Ellie Hodges and Duncan Grant regarding reply; draft email to Roland Fox regarding reply; continue work on revisions to motion for summary judgment.
12/14/05	Lipe, Guy	\$2,125.00	5.00	\$2,125.00	5.00	Exchange emails with Denis Chatelean regarding [summary judgment evidence]; prepare for, participate in conference call on exchanges with Duncan Grant and Ellie Hodges regarding same and filing of same; compile additional exhibits for Delaware filing; exchange emails with Duncan Grant regarding exhibits; telephone conferences and email exchanges with Duncan Grant and Ellie Hodges regarding reply to response to motion to add verification; work on revised draft of reply.
12/22/05	Lipe, Guy	\$212.50	0.50	\$212.50	0.50	Conduct preliminary review of AI Cap filings in Delaware; telephone conference with Duncan Grant regarding same and deadlines associated with replies; draft email to Roland Fox and Rodrigo Marquez regarding same.
12/23/05	Lipe, Guy	\$637.50	1.50	\$637.50	1.50	Review reply to opposition to motion for summary judgment in Delaware; develop counter-arguments to those raised in reply.
12/24/05	Lipe, Guy	\$850.00	2.00	\$850.00	2.00	Review response to motion for leave to file surrepley; prepare reply to same; draft email to Rodrigo Marquez and Ellie Hodges regarding same.
12/27/05	Lipe, Guy	\$106.25	0.25	\$106.25	0.25	Telephone conference with Rodrigo Marquez regarding draft reply to response to motion for leave to file surrepley.
12/28/05	Lipe, Guy	\$637.50	1.50	\$637.50	1.50	Review proposed revisions to reply to motion for leave to file surrepley; prepare revised draft of reply; draft emails to Ellie Hodges and Duncan Grant regarding same.
12/30/05	Lipe, Guy	\$106.25	0.25	\$106.25	0.25	Draft emails to Rodrigo Marquez and Ellie Hodges regarding opposition to cross motion for summary judgment and timing for preparation of reply.
12/30/05	Powers, Jason M.	\$81.25	0.25	\$81.25	0.25	Review AI-Cap response brief.
1/2/06	Lipe, Guy	\$900.00	2.00	\$900.00	2.00	Work on draft of reply to opposition to cross-motion for summary judgment.
1/3/06	Lipe, Guy	\$4,275.00	9.50	\$4,275.00	9.50	Prepare draft of reply to opposition to cross-motion for summary judgment; telephone conference with Ellie Hodges regarding same; continue work on reply; draft email to Ellie Hodges regarding reply.
1/4/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Continue work on reply to opposition to cross motion for summary judgment; prepare insert for same on collusion issue; exchange emails with Ellie Hodges regarding reply; review comments from Ellie Hodges on reply; prepare revised version of reply and draft email to Rodrigo Marquez regarding reply to opposition to cross motion for summary judgment.
1/5/06	Lipe, Guy	\$1,350.00	3.00	\$1,350.00	3.00	Exchange emails with Ellie Hodges, Rodrigo Marquez, and Duncan Grant regarding reply to opposition to cross motion for summary judgment; prepare additional revisions to reply, including record citations; exchange emails with Duncan Grant regarding additional revisions; review additional revisions to reply from Duncan Grant; prepare comments and suggestions with regard to additional revisions; finalize reply for filing; telephone conference with Duncan Grant regarding anticipated events in Delaware proceedings following filing of reply.

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3/9/06	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	\$112.50	0.25	Exchange emails with Duncan Grant regarding checking of docket sheet for activity relating to attempt to obtain new writs.
7/20/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	\$175.00	0.50	Review Delaware court orders; confer with Guy Lipe regarding same; correspond with Roland Fox regarding same.
7/24/06	Lipe, Guy	\$1,800.00	4.00	\$900.00	2.00	\$900.00	2.00	[separate matter]; review orders in Delaware case; exchange emails with Roland Fox regarding Delaware orders; develop discovery strategy in Delaware case; telephone conference with Phillip Dye regarding legal issues associated with question relating to Congo's [rights in Delaware action]; draft email to Duncan Grant regarding FG decision; telephone conference with Duncan Grant regarding discovery issues in Delaware action; [separate matter];
7/25/06	Lipe, Guy	\$675.00	1.50	\$675.00	1.50	\$675.00	1.50	Develop strategy in dealing with discovery in Delaware litigation; draft email to Bill Katz regarding strategy in dealing with disclosure and discovery plans/scheduling order; telephone conference with Bill Katz regarding same.
7/26/06	Lipe, Guy	\$450.00	1.00	\$450.00	1.00	\$450.00	1.00	Draft email to Roland Fox regarding Delaware discovery issues; telephone conferences with Roland Fox regarding same; exchange emails with Duncan Grant, Jason Powers, and Bill Katz regarding same.
7/26/06	Mayer, Walter R.	\$1,653.75	5.25	\$1,653.75	5.25	\$1,653.75	5.25	Research rule 26 disclosure; review documents for Delaware matter; collect documents for initial production; conference with Jason Powers on initial disclosure.
7/26/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	\$175.00	0.50	Review correspondence on disclosure issues; confer with Walter Mayer regarding disclosure draft.
7/27/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	\$225.00	0.50	Telephone conferences with Duncan Grant and Bill Katz regarding strategy on possible motion to dismiss [on discovery issues] and scheduling order.
7/27/06	Mayer, Walter R.	\$1,181.25	3.75	\$1,181.25	3.75	\$1,181.25	3.75	Review Delaware matter documents; draft Rule 26 Initial Disclosure.
7/28/06	Hinde, Daniel E.	\$1,218.75	3.25	\$1,218.75	3.25	\$1,218.75	3.25	Research [jurisdictional issues].
7/31/06	Hinde, Daniel E.	\$2,531.25	6.75	\$2,531.25	6.75	\$2,531.25	6.75	Continue research on [jurisdictional issues]; leave a voicemail for Guy Lipe regarding same; send an email to Guy Lipe regarding same.
7/31/06	Nunnally, Knox	\$325.00	0.50	\$325.00	0.50	\$325.00	0.50	Review Delaware filings.
8/1/06	Hinde, Daniel E.	\$1,875.00	5.00	\$1,875.00	5.00	\$1,875.00	5.00	Exchange emails with Guy Lipe regarding research; finish reviewing cases on thoughts to draft a research memorandum regarding same.
8/2/06	Hinde, Daniel E.	\$2,906.25	7.75	\$2,906.25	7.75	\$2,906.25	7.75	Draft research memorandum on [jurisdictional issues]; research [jurisdictional issues];
8/3/06	Hinde, Daniel E.	\$1,500.00	4.00	\$1,500.00	4.00	\$1,500.00	4.00	Proofread, revised, edit, shepherdize, and finalize research memorandum on [jurisdictional issues];
8/3/06	Mayer, Walter R.	\$78.75	0.25	\$78.75	0.25	\$78.75	0.25	Send same to Guy Lipe.
8/3/06	Powers, Jason M.	\$87.50	0.25	\$87.50	0.25	\$87.50	0.25	Review Delaware documents for Initial Disclosures; conference with Jason Powers on same.
8/3/06	Mayer, Walter R.	\$315.00	1.00	\$315.00	1.00	\$315.00	1.00	Confer with Walter Mayer regarding disclosures; review disclosures progress.
8/8/06	Powers, Jason M.	\$612.50	1.75	\$612.50	1.75	\$612.50	1.75	Review and organize documents for production; conference with Jason Powers on initial disclosures; attend to preparation of documents for disclosure.
8/9/06	Mayer, Walter R.	\$236.25	0.75	\$236.25	0.75	\$236.25	0.75	Review and revise initial disclosures in Delaware action; monitor progress of document collection for initial disclosure production; correspond with team regarding conference issues.
8/9/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	\$175.00	0.50	Conference with Jason Powers on initial disclosures and scheduling order; review discovery and draft deposition notice to create list of discovery subjects for Delaware matter.
8/10/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	\$225.00	0.50	Prepare documents for production; confer with William Katz and Walter Mayer regarding initial disclosures and other issues.
8/10/06	Mayer, Walter R.	\$393.75	1.25	\$393.75	1.25	\$393.75	1.25	Review draft of scheduling order for Delaware litigation; exchange emails with Jason Powers and Walter Mayer regarding same.
8/10/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	\$175.00	0.50	Review and revise draft scheduling order; conference with Jason Powers and Guy Lipe regarding same.
8/10/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	\$175.00	0.50	Review and comment on initial disclosure/pretrial order papers.

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8/14/06	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Review draft scheduling order; prepare comments on same; exchange emails with Jason Powers, Walter Mayer, and Duncan Grant regarding same.
8/14/06	Mayer, Walter R.	\$78.75	0.25	\$78.75	0.25	Conference with Jason Powers on [document production issues]; conference with Roland Fox on Scheduling Order.
8/14/06	Powers, Jason M.	\$437.50	1.25	\$437.50	1.25	Locate production documents at client request; monitor progress on draft scheduling order.
8/16/06	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Exchange emails with Jason Powers and Duncan Grant regarding scheduling order.
8/18/06	Mayer, Walter R.	\$157.50	0.50	\$157.50	0.50	Review proposed discovery plan and documents.
8/21/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Review draft of scheduling order; telephone conference with Duncan Grant regarding same; review Af Cap initial disclosures; draft email to Roland Fox regarding same.
8/22/06	Lipe, Guy	\$1,125.00	2.50	\$1,125.00	2.50	Prepare for scheduling conference in Delaware case; telephone conference with Duncan Grant regarding same; participate in scheduling conference; exchange emails and telephone conferences with Bill Katz and Duncan Grant regarding scheduling conference and issues coming out of scheduling conference; work on revised draft of scheduling order; exchange emails with Duncan Grant regarding revised draft of scheduling order provided by Af Cap's counsel.
8/24/06	Lipe, Guy	\$675.00	1.50	\$225.00	0.50	regarding impact of Fifth Circuit decision on Delaware proceedings; prepare email to Roland Fox regarding Delaware developments.
10/10/06	Lipe, Guy	\$3,600.00	8.00	\$3,150.00	7.00	Prepare for and participate in meetings with potential experts; [separate matter].
10/10/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Return to Houston from meetings with potential experts in Washington.
10/16/06	Lipe, Guy	\$337.50	0.75	\$337.50	0.75	Review discovery requests; exchange emails with Roland Fox regarding same.
10/17/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Telephone conference with Roland Fox regarding discovery issues and timing of deposition and preparation for deposition; exchange emails with Jason Powers regarding discovery issues; conference with Walter Mayer regarding same.
10/20/06	Lipe, Guy	\$337.50	0.75	\$225.00	0.50	Prepare for status conference; telephone conference with Roland Fox regarding same; telephone conference with Roland Fox regarding Delaware discovery issues; [separate matter].
10/23/06	Mayer, Walter R.	\$708.75	2.25	\$708.75	2.25	Review discovery requests; review and collect previous discovery responses; conference with Guy Lipe regarding same.
10/24/06	Mayer, Walter R.	\$393.75	1.25	\$393.75	1.25	Review discovery responses; conference with Guy Lipe regarding same.
10/25/06	Lipe, Guy	\$2,250.00	5.00	\$1,125.00	2.50	Exchange emails with Andy Derman regarding expert issues; [separate matter].
10/25/06	Mayer, Walter R.	\$630.00	2.00	\$630.00	2.00	Witness] regarding expert issues; prepare summary of proposed approaches to document discovery; draft email to Roland Fox regarding same; [separate matter].
10/26/06	Mayer, Walter R.	\$551.25	1.75	\$551.25	1.75	Review Guy Lipe memorandum on discovery responses; research [discovery issues]; conference with Guy Lipe regarding same.
10/27/06	Lipe, Guy	\$675.00	1.50	\$337.50	0.75	Collect, organize, and review documents produced in related matters [for documents responsive to discovery requests].
10/27/06	Nunnally, Knox	\$162.50	0.25	\$162.50	0.25	Review email from Af Cap's Delaware counsel regarding motion for substitution and request for notice of transfer; draft proposed response to same; exchange emails with Roland Fox and Andy Derman regarding same; [separate matter].
10/29/06	Mayer, Walter R.	\$630.00	2.00	\$630.00	2.00	Review discovery requests and Guy Lipe memorandum; create summary of requests and deposition notice.
10/30/06	Lipe, Guy	\$900.00	2.00	\$450.00	1.00	Telephone conferences with Andy Derman, Duncan Grant, and Roland Fox regarding response to email from Af Cap's Delaware counsel; revise email to Af Cap's Delaware counsel; telephone conferences with Andy Derman, Duncan Grant, and Roland Fox regarding discovery issues; telephone conferences with Jason Powers and conference with Walter Mayer regarding same; [separate matter].
10/30/06	Mayer, Walter R.	\$2,677.50	8.50	\$2,677.50	8.50	Revise summary of requests and deposition notices; collect documents produced in Delaware matter and billing records; review documents produced in related matters; conference with Jason Powers and Guy Lipe regarding same.

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10/30/06	Powers, Jason M.	\$787.50	2.25	\$787.50	2.25	Review and analyze discovery requests; confer with Walter Mayer regarding same; review appeal pleadings.
10/31/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Telephone conferences and email exchanges with Roland Fox, Jason Powers, Andy Derman, and Bill Katz regarding discovery issues.
10/31/06	Mayer, Walter R.	\$1,575.00	5.00	\$1,575.00	5.00	Review produced documents from related matters for responsiveness.
10/31/06	Powers, Jason M.	\$525.00	1.50	\$525.00	1.50	Review discovery papers; begin planning responses; confer with Guy Lipe regarding same.
11/1/06	Lipe, Guy	\$2,025.00	4.50	\$2,025.00	4.50	Prepare for, participate in conference call on discovery issues; review memorandum drafted by Jason Powers regarding document gathering and retention; exchange emails with Jason Powers regarding same; work on gathering of documents for deposition preparation for Roland Fox; review results of research on location of deposition; exchange emails with Duncan Grant regarding same; work on discovery responses.
11/1/06	Mayer, Walter R.	\$1,417.50	4.50	\$1,417.50	4.50	Conference with client, Guy Lipe, and Jason Powers on discovery and deposition issues; review produced documents from related matters for responsiveness.
11/1/06	Nunnally, Knox	\$325.00	0.50	\$325.00	0.50	Review work in progress regarding depositions.
11/1/06	Powers, Jason M.	\$1,662.50	4.75	\$1,662.50	4.75	Prepare for and participate in telephone conferences with team and Roland Fox regarding discovery answers; prepare memorandum for document custodians on e-mail collection and retention; prepare memorandum on documents to be collected.
11/2/06	Lipe, Guy	\$1,125.00	2.50	\$1,125.00	2.50	Exchange emails with Andy Derman regarding expert issues; work on discovery issues; prepare outline of points to make on location and scope of deposition; exchange emails with Al Cap's counsel regarding deposition issues.
11/2/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Confer and correspond with client regarding document collection; confer with Guy Lipe regarding documents in Congo.
11/3/06	Lipe, Guy	\$1,125.00	2.50	\$1,125.00	2.50	Work on issues pertinent to deposition preparation; prepare list of items to be gathered for delivery to Roland Fox for deposition preparation; draft email to Walter Mayer regarding same; prepare for, participate in conference calls with Duncan Grant and counsel for Al Cap regarding deposition issues; review motion to substitute parties; draft email to Roland Fox regarding same; draft email to [potential witness] issues; review email from Walter Mayer regarding documents for RolandFox deposition preparation; draft email to Andy Derman regarding same.
11/3/06	Mayer, Walter R.	\$551.25	1.75	\$551.25	1.75	Collect and send documents for Roland Fox's review.
11/6/06	Lipe, Guy	\$1,350.00	3.00	\$900.00	2.00	Prepare first drafts of answers to interrogatories and requests for admissions; draft email to Roland Fox regarding same; [separate matter]; exchange emails with Roland Fox regarding deposition.
11/6/06	Mayer, Walter R.	\$1,417.50	4.50	\$1,417.50	4.50	Review produced documents for documents responsive to requests for production; search for additional documents for Roland Fox's preparation for deposition.
11/6/06	Powers, Jason M.	\$1,575.00	4.50	\$1,225.00	3.50	Draft response to request for production; [separate matter]; confer with Walter Mayer on discovery progress.
11/7/06	Lipe, Guy	\$2,250.00	5.00	\$2,250.00	5.00	Compile materials for Ambassador Kaueper; draft emails to Andy Derman and Bill Katz regarding same; prepare for, participate in meeting with Jason Powers and Walter Mayer on discovery and document production issues; prepare objections to deposition notice; prepare revised draft of objections to request for production of documents; work on discovery issues.
11/7/06	Mayer, Walter R.	\$1,732.50	5.50	\$1,732.50	5.50	Conference with Guy Lipe and Jason Powers on discovery; review draft response to requests for production; review PER documents for responsive documents.
11/7/06	Powers, Jason M.	\$1,400.00	4.00	\$1,050.00	3.00	Confer with Walter Mayer and Guy Lipe regarding document collection progress and discovery responses; collect documents for production; revise discovery answers; [separate matter]; Prepare designated CMS documents per Walter Mayer's instruction.
11/8/06	Felton, Leslie	\$105.00	1.00			
11/8/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Exchange emails with Duncan Grant and Jason Powers on discovery issues; exchange emails with Duncan Grant regarding motion to substitute; work on additional revisions to discovery responses; draft email to Roland Fox regarding same; telephone conference with Roland Fox regarding discovery issues; prepare revised drafts of discovery responses.
11/8/06	Mayer, Walter R.	\$2,441.25	7.75	\$2,441.25	7.75	Review GAR documents; collect and review most recent productions.



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11/8/06	Nunnally, Knox	\$162.50	0.25	\$162.50	0.25	Review discovery status.
11/8/06	Powers, Jason M.	\$437.50	1.25	\$437.50	1.25	Review comments on responses to request for production; review and revise objections to deposition notice; monitor document collection and production progress.
11/9/06	Felton, Leslie	\$577.50	5.50	\$577.50	5.50	Prepare designated CMS documents per Walter Mayer's instruction.
11/9/06	Lipe, Guy	\$1,125.00	2.50	\$1,125.00	2.50	Prepare revised draft of interrogatory answers and declaration supporting same; telephone conference with Roland Fox regarding same; prepare revisions to same; draft email to Roland Fox regarding same.
11/9/06	Mayer, Walter R.	\$2,126.25	6.75	\$2,126.25	6.75	Review produced documents and NUE documents.
11/9/06	Nunnally, Knox	\$162.50	0.25	\$162.50	0.25	Review discovery work in progress regarding interrogatories.
11/9/06	Powers, Jason M.	\$350.00	1.00	\$350.00	1.00	Review and revise discovery responses; confer with Walter Mayer regarding document collection progress.
11/10/06	Felton, Leslie	\$210.00	2.00	\$210.00	2.00	Prepare designated CMS documents per Jason Powers instruction.
11/10/06	Lipe, Guy	\$1,575.00	3.50	\$1,575.00	3.50	Further revise interrogatory answers and responses to requests for admissions; draft email to Averil Eager regarding interrogatory answers; review comments from Roland Fox on responses to requests for production; prepare revised draft of responses to request for production and objections to deposition notice; draft email to Roland Fox regarding same; draft email to Jason Powers and Walter Mayer regarding outstanding action items for finalization of discovery responses and production of documents; draft email to Andy Derman regarding responses to requests for admissions; exchange emails with Andy Derman regarding deposition issues.
11/10/06	Mayer, Walter R.	\$1,181.25	3.75	\$1,181.25	3.75	Review and finalize set of documents for production; review instructions and definitions for scope of objections.
11/10/06	Powers, Jason M.	\$1,662.50	4.75	\$1,662.50	4.75	Revise discovery pleadings and circulate for comment; review, revise, and prepare document set for production; confer with team regarding same.
11/13/06	Lipe, Guy	\$2,475.00	5.50	\$2,475.00	5.50	Prepare final versions of discovery responses; exchange emails with Dot Willauer regarding service of discovery responses and production documents; review production documents for completeness; exchange emails with Andy Derman regarding expert issues; prepare for deposition preparation; draft email to Walter Mayer regarding same.
11/13/06	Mayer, Walter R.	\$393.75	1.25	\$393.75	1.25	Review discovery responses; draft transmittal letter.
11/13/06	Powers, Jason M.	\$262.50	0.75	\$262.50	0.75	Finalize documents for filing; coordinate production and service of discovery responses; confer with Guy Lipe regarding outstanding issues.
11/14/06	Lipe, Guy	\$2,925.00	6.50	\$2,925.00	6.50	Exchange emails with [potential witness] regarding [potential witness] issues; prepare for, participate in meetings with Roland Fox on document production and deposition preparation issues; prepare response to motion to substitute parties.
11/14/06	Powers, Jason M.	\$350.00	1.00	\$350.00	1.00	Coordinate collection and production of documents with Roland Fox.
11/15/06	Lipe, Guy	\$4,050.00	9.00	\$2,250.00	5.00	Draft email to Roland Fox regarding motion to substitute parties and response to same; [separate matter]; prepare for, participate in conferences with Roland Fox regarding deposition preparation; meet with Roland Fox and Sharon Rodgers regarding factual issues; continue conference with Roland Fox on deposition preparation; work on document production issues; conferences and telephone conferences with Jason Powers regarding same.
11/15/06	Mayer, Walter R.	\$551.25	1.75	\$551.25	1.75	Conference with Guy Lipe on discovery to be drafted; collect and review discovery.
11/15/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Coordinate collection of documents for production.

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11/16/06	Lipe, Guy	\$4,050.00	9.00	\$2,250.00	5.00	Work on deposition preparation and document production issues; exchange emails with Duncan Grant regarding filing of response to motion to substitute parties; [potential witness] and conferences with Roland Fox regarding [potential witness] issues; telephone conference with Andy Derman and conference with Roland Fox regarding [potential witness] issues to be addressed by [potential witness]; continue conference with Roland Fox on deposition preparation and document production issues; [separate matter]; compile documents for [potential witness] and Roland Fox.
11/16/06	Mayer, Walter R.	\$945.00	3.00	\$945.00	3.00	Review claims by AF-Cap; begin draft of discovery.
11/17/06	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Attend to transmission of materials to [potential witness] and Roland Fox.
11/17/06	Mayer, Walter R.	\$1,496.25	4.75	\$1,496.25	4.75	Review pleadings by AF-Cap; draft discovery requests.
11/17/06	Powers, Jason M.	\$87.50	0.25	\$87.50	0.25	Coordinate collection of documents for potential production.
11/18/06	Mayer, Walter R.	\$1,417.50	4.50	\$1,417.50	4.50	Draft Requests for Production and Interrogatories.
11/19/06	Mayer, Walter R.	\$787.50	2.50	\$787.50	2.50	Draft Requests for Production and Interrogatories.
11/20/06	Mayer, Walter R.	\$1,181.25	3.75	\$1,181.25	3.75	Revise and finalize Request for Production, Interrogatories, and Notice of Deposition; conference with Jason Powers on document production.
11/20/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Confer with Walter Mayer regarding discovery documents.
11/21/06	Gong, Miranda Lin S.	\$240.00	1.00	\$240.00	1.00	Review French documents for responsiveness and privilege; analyze potential issues with asserting privilege with certain documents.
11/21/06	Lipe, Guy	\$1,575.00	3.50	\$1,575.00	3.50	Prepare for, participate in conference call with Ambassador Kaueper, Andy Derman, Bill Katz, and Roland Fox; work on Delaware discovery issues, including deposition issues; telephone conferences with Duncan Grant and Roland Fox regarding same.
11/21/06	Mayer, Walter R.	\$2,283.75	7.25	\$2,283.75	7.25	Review documents from client for production; conference with Jason Powers regarding same.
11/21/06	Powers, Jason M.	\$350.00	1.00	\$282.50	0.75	Confer with Walter Mayer regarding document production issues; conferences with Guy Lipe regarding corporate representative deposition and other issues; [separate matter].
11/22/06	Gong, Miranda Lin S.	\$120.00	0.50	\$120.00	0.50	Review additional French documents and examine privilege issues.
11/22/06	Lipe, Guy	\$1,575.00	3.50	\$1,575.00	3.50	Work on issues relating to deposition; multiple telephone conferences with Roland Fox, Duncan Grant, Jason Powers, and Ken Kaplan regarding deposition issues; work on document production issues; exchange emails with Jason Powers regarding same; draft email to Ken Kaplan regarding deposition issues; exchange emails with Walter Mayer and Miranda Gong regarding privilege issues.
11/22/06	Mayer, Walter R.	\$1,102.50	3.50	\$1,102.50	3.50	Research [privilege issues]; review and collect documents for production.
11/22/06	Powers, Jason M.	\$525.00	1.50	\$525.00	1.50	Coordinate collection of production items; confer with Roland Fox regarding collection of documents; telephone conferences regarding deposition scheduling.
11/23/06	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Telephone conference with Roland Fox regarding deposition issues; draft emails to Duncan Grant and Jason Powers regarding deposition issues.
11/24/06	Lipe, Guy	\$900.00	2.00	\$900.00	2.00	Review emails from Roland Fox, Duncan Grant, Andy Derman, and Jason Powers regarding deposition issues; finalize email to Ken Kaplan regarding deposition issues; telephone conference with Ken Kaplan regarding deposition issues; draft emails to Roland Fox, Andy Derman, Duncan Grant, and Jason Powers regarding deposition and document production issues.
11/25/06	Lipe, Guy	\$450.00	1.00	\$450.00	1.00	Exchange emails with Duncan Grant and Jason Powers regarding deposition and document production issues.
11/25/06	Mayer, Walter R.	\$1,102.50	3.50	\$787.50	2.50	Mark Roland Fox's documents for Production; conference with Jason Powers regarding document production issues; review and redact billing records...

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11/25/06	Powers, Jason M.	\$1,487.50	4.25	\$1,487.50	4.25	Review documents designated for production and comments from client on same; review and comment on deposition objection issues; update Guy Lipe on production status.
11/26/06	Lipe, Guy	\$3,600.00	8.00	\$3,600.00	8.00	Prepare for deposition; travel to London; prepare for meetings with Roland Fox regarding deposition in London while in transit.
11/27/06	Johnson, Tina P.	\$300.00	4.00	\$300.00	4.00	Bates label documents per Jason Powers instructions.
11/27/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Prepare for meetings with Roland Fox concerning deposition while in route to London.
11/27/06	Lipe, Guy	\$4,950.00	11.00	\$4,950.00	11.00	Continue preparation for deposition; meetings with Roland Fox regarding deposition; work on document production issues; multiple email exchanges and telephone conferences with Jason Powers regarding deposition and document production issues; prepare for next day of meetings with Roland Fox regarding deposition; [expert] issues.
11/27/06	Powers, Jason M.	\$1,312.50	3.75	\$1,312.50	3.75	Coordinate supplemental production of documents; correspond with opposing counsel regarding deposition; confer with Guy Lipe regarding document production and deposition issues.
11/28/06	Johnson, Tina P.	\$187.50	2.50	\$187.50	2.50	Bates label documents per Jason Powers instructions.
11/28/06	Lipe, Guy	\$5,175.00	11.50	\$5,175.00	11.50	Prepare for, participate in meetings with Roland Fox regarding deposition; work on deposition and document production issues; multiple telephone conferences with Jason Powers regarding same; continue meetings with Roland Fox regarding deposition; continue work preparing for meetings with Roland Fox regarding deposition; telephone conference with Jason Powers regarding discovery issues.
11/28/06	Powers, Jason M.	\$1,050.00	3.00	\$1,050.00	3.00	Coordinate preparation of and serve supplemental production of documents; confer with Guy Lipe regarding same and discovery pleadings issues.
11/29/06	Lipe, Guy	\$4,950.00	11.00	\$4,725.00	10.50	Continue preparation for meetings with Roland Fox regarding deposition; attend to delivery of production documents to Ken Kaplan; continue meetings with Roland Fox and Andy Derman regarding deposition; telephone conferences with Jason Powers and Duncan Grant regarding [separate matter] discovery submission for December 4 discovery conference in At Cap Delaware proceeding; prepare draft of discovery submission.
11/29/06	Mayer, Walter R.	\$393.75	1.25	\$393.75	1.25	[documents] to draft and send insert to Judge Robinson letter on [discovery issues]
11/29/06	Powers, Jason M.	\$437.50	1.25	\$437.50	1.25	Confer with Guy Lipe and Duncan Grant regarding filings on discovery and state court case status; confer with Walter Mayer regarding e-mail production issues.
11/30/06	Lipe, Guy	\$5,850.00	13.00	\$5,400.00	12.00	Identify issues for further discussion with Roland Fox for final deposition preparation; conference with Roland Fox and attend Roland Fox deposition; conferences with Roland Fox and Andy Derman; confer with Ken Kaplan on discovery issues; [separate matter].
12/1/06	Lipe, Guy	\$3,150.00	7.00	\$3,150.00	7.00	Return to Houston from CMS Nomeco deposition in London.
12/4/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Travel to New York for meetings with David Kaeuper; prepare for meetings in transit to New York.
12/5/06	Lipe, Guy	\$4,500.00	10.00	\$4,275.00	9.50	Prepare for, participate in meetings in New York with David Kaeuper; participate in meetings with David Kaeuper, Roland Fox, and Jean Michel Runacher; [separate matter].
12/5/06	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Return to Houston from meetings with David Kaeuper in New York.
12/6/06	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Exchange emails with Jason Powers regarding document production issues.
12/6/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Review privilege log issues and confer with Walter Mayer regarding same; confer with Roland Fox regarding document search.
12/7/06	Lipe, Guy	\$450.00	1.00	\$225.00	0.50	Exchange emails with [potential witness] regarding [potential witness] issues; exchange emails with Jason Powers regarding discovery issues; [separate matter]; draft email to Roland Fox regarding [potential witness] report.
12/7/06	Powers, Jason M.	\$87.50	0.25	\$87.50	0.25	Confer with Roland Fox regarding e-mail search.
12/8/06	Lipe, Guy	\$2,475.00	5.50	\$2,475.00	5.50	Review order on motion to substitute; prepare discovery requests to At Cap; draft emails to Roland Fox regarding order on motion to substitute and discovery requests to At Cap; exchange emails with Andy Derman and Roland Fox regarding State Department's approval of David Kaeuper as an expert.
12/8/06	Mayer, Walter R.	\$945.00	3.00	\$787.50	2.50	Research [discovery issues relating to bond for security and costs]; review expert report and related correspondence; conference with Guy Lipe regarding same; [separate matter].
12/8/06	Powers, Jason M.	\$350.00	1.00	\$350.00	1.00	Prepare for and confer with Guy Lipe regarding discovery dispute/negotiations.

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12/10/06	Mayer, Walter R.	\$236.25	0.75	\$236.25	0.75	Review privileged documents for documents responsive to current document request.
12/11/06	Lipe, Guy	\$1,125.00	2.50	\$1,125.00	2.50	Telephone conference with David Kaeper regarding addition to expert report to address emails with Roland Fox regarding discovery requests to AI Cap; revise and finalize discovery requests; exchange emails with Duncan Grant regarding Kaeper report and documents to accompany report and transmittal letter regarding same; exchange emails with Andy Derman and Andrew Meisheimer regarding documents to accompany expert report; exchange emails with Duncan Grant regarding same.
12/11/06	Powers, Jason M.	\$87.50	0.25	\$87.50	0.25	Monitor progress of privilege review; contact opposing counsel regarding discovery disputes.
12/12/06	Lipe, Guy	\$1,575.00	3.50	\$1,575.00	3.50	Exchange emails with Jason Powers and Walter Mayer regarding document production issues; gather documents for production with expert report; exchange emails with Andrew Meisheimer regarding same; attend to finalization of compilation of documents to accompany expert report; exchange emails with Duncan Grant regarding submission of expert report; telephone conferences with Ken Kaplan, Sandy Saunders, Duncan Grant, Andy Derman, and Roland Fox regarding one day extension of expert deadline; exchange emails with Ken Kaplan regarding same.
12/12/06	Mayer, Walter R.	\$1,732.50	5.50	\$1,732.50	5.50	Review privilege documents for responsiveness to current Request for Production.
12/12/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Confer with Roland Fox regarding document issues; schedule discovery conference with AI-Cap counsel.
12/13/06	Lipe, Guy	\$1,125.00	2.50	\$562.50	1.25	Prepare supplements to answers in garnishment proceeding and chancery court proceeding to address issues raised by Fifth Circuit decision; prepare motions for leave to file supplements; exchange emails with Duncan Grant regarding same; draft email to Roland Fox regarding same; draft email to Ken Kaplan regarding same; finalize correspondence to accompany expert report; exchange emails with Duncan Grant regarding service of expert report.
12/13/06	Mayer, Walter R.	\$1,102.50	3.50	\$1,102.50	3.50	Review privileged documents for responsiveness to current Request for Production; conference with Jason Powers regarding same.
12/14/06	Lipe, Guy	\$337.50	0.75	\$337.50	0.75	Review AI Cap's expert report; draft emails to Roland Fox, Andy Derman, and rest of team regarding same.
12/18/06	Lipe, Guy	\$562.50	1.25	\$562.50	1.25	Exchange emails with Duncan Grant regarding expert depositions; review email from Ken Kaplan regarding additional details requested for Kaeper report; gather additional information and draft email to Ken Kaplan regarding same.
12/19/06	Powers, Jason M.	\$437.50	1.25	\$437.50	1.25	Prepare for and participate in telephone conference with Ken Kaplan regarding discovery issues; confer with Roland Fox regarding Kaplan call.
12/20/06	Gong, Miranda Lin S.	\$60.00	0.25	\$60.00	0.25	Assist with review of documents in French.
12/20/06	Powers, Jason M.	\$1,137.50	3.25	\$1,137.50	3.25	Review documents for potential production; draft discovery conference letter to opposing counsel.
12/21/06	Powers, Jason M.	\$700.00	2.00	\$700.00	2.00	Prepare for and participate in telephone conference with AI-Cap counsel; continue preparation of production documents.
12/22/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Review correspondence from Kaplan and circulate same with comments; correspond with counsel regarding privilege log issues.
12/27/06	Gong, Miranda Lin S.	\$540.00	2.25	\$540.00	2.25	Review documents in French for responsiveness to requests for production.
12/27/06	Powers, Jason M.	\$1,312.50	3.75	\$1,312.50	3.75	Revise privilege log; review additional documents for potential production; confer with Miranda Gong regarding documents to be reviewed; confer with Brian Wrathmell, Jon Carey, and Natasha Silva regarding email review issues.
12/28/06	Powers, Jason M.	\$350.00	1.00	\$350.00	1.00	Revise privilege log; review correspondence.
12/29/06	Powers, Jason M.	\$175.00	0.50	\$175.00	0.50	Finalize privilege log and prepare for service.
1/2/07	Gong, Miranda Lin S.	\$213.75	0.75	\$213.75	0.75	Review documents in French for responsiveness to document requests.



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12/07	Lipe, Guy	\$1,125.00	2.50	\$450.00	1.00	[separate matter]; review correspondence relating to discovery disputes in federal court proceeding; conference with Jason Powers regarding status and strategy with regard to discovery disputes, including email issues.
12/07	Powers, Jason M.	\$2,100.00	5.25	\$2,100.00	5.25	Review documents for potential production; prepare to and confer with Guy Lipe regarding pending discovery issues; draft letter to opposing counsel regarding discovery disputes.
1/3/07	Lipe, Guy	\$1,350.00	3.00	\$450.00	1.00	Telephone conference with Andy Derman regarding deposition issues; [separate matter]; review draft of letter to Ken Kaplan regarding position on discovery disputes; prepare revised draft of letter; exchange emails with Jason Powers regarding same; draft email to Roland Fox regarding same; draft email to Ken Kaplan regarding depositions; [separate matter].
1/3/07	Powers, Jason M.	\$300.00	0.75	\$300.00	0.75	Telephone conference with Brian Wrathall and others regarding discovery status; review correspondence on discovery issues; confer with Walter Mayer regarding same.
1/4/07	Gong, Miranda Lin S.	\$498.75	1.75	\$498.75	1.75	Review additional French documents for responsiveness to request for production; become apprised of relevant facts of matter to bear on responsiveness issues.
1/4/07	Lipe, Guy	\$1,575.00	3.50	\$450.00	1.00	[separate matter]; review email from Jason Powers regarding discovery issues; exchange emails with Jason Powers and Miranda Gong regarding same; [separate matter].
1/4/07	Powers, Jason M.	\$800.00	2.00	\$600.00	1.50	Review and prepare documents for production; [separate matter]; correspond with team regarding document issues.
1/5/07	Lipe, Guy	\$1,350.00	3.00	\$450.00	1.00	Kaplan regarding deposition issues; exchange emails with Roland Fox regarding deposition issues; review email from Ken Kaplan regarding motion for contempt sanctions and injunctive relief; draft email to Roland Fox regarding same; draft email to Ken Kaplan regarding same; [separate matter].
1/8/07	Lipe, Guy	\$2,700.00	6.00	\$1,800.00	4.00	Review email from Ken Kaplan regarding nature of relief to be requested in motion for contempt sanctions and preliminary injunction; [separate matter]; exchange emails with Roland Fox, Andy Derman, and Duncan Grant regarding rebuttal expert deadline; telephone conference with Roland Fox regarding discovery issues; prepare revised draft of letter to Ken Kaplan regarding discovery issues; exchange emails with Jason Powers regarding same; draft email to Roland Fox regarding second set of discovery requests; conference with Jason Powers regarding second set of discovery requests; develop strategy regarding same; telephone conference with Sharon Rodgers regarding document issues; exchange emails with Jason Powers regarding document issues and letter to Ken Kaplan; [separate matter].
1/8/07	Powers, Jason M.	\$2,700.00	6.75	\$2,700.00	6.75	Finalize letter to opposing counsel regarding first discovery request issues; prepare supplemental documents and supplemental privilege log for production; confer with Guy Lipe regarding second discovery requests; prepare memo to Roland Fox regarding discovery requests.
1/9/07	Powers, Jason M.	\$400.00	1.00	\$400.00	1.00	Produce privilege log; confer with team regarding discovery responses and schedule; review documents for potential production.
1/10/07	Gong, Miranda Lin S.	\$213.75	0.75	\$213.75	0.75	Review documents in English and French for responsiveness to request for production and/or responsiveness to requests for admissions and interrogatories.
1/10/07	Lipe, Guy	\$5,850.00	13.00	\$450.00	1.00	[separate matter]; prepare for, participate in conference call with Roland Fox and Andy Derman regarding discovery issues; prepare draft of email to Ken Kaplan regarding depositions; draft email to Roland Fox, Andy Derman, Jason Powers, and Duncan Grant regarding same.
						[separate matter]; review email from Ken Kaplan regarding confidentiality agreement; exchange emails with Walter Mayer regarding confidentiality agreement; conference with Walter Mayer regarding confidentiality agreement; draft email to Duncan Grant regarding confidentiality agreement; exchange emails with Clara Beuth regarding email discovery issues; draft email to Ken Kaplan regarding proposed confidentiality agreement;

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1/10/07	Mayer, Walter R.	\$262.50	0.75	\$262.50	0.75	Roland Fox regarding confidentiality agreement. Review confidentiality agreement; draft and send comments and suggested revisions.	[separate matter]; draft email to
1/11/07	Gong, Miranda-Lin S.	\$213.75	0.75	\$213.75	0.75	Further review documents in English and in French for responsiveness to requests for production; review requests for admissions and interrogatories; prepare internal e-mail memorandum on issues regarding certain documents.	
1/11/07	Lipe, Guy	\$3,600.00	8.00	\$3,150.00	7.00	Review AI-Cap's motion for contempt, sequestration order, and injunctive relief in AI Cap, and supporting affidavit; begin work on response to motion for contempt, sequestration order, and injunctive relief in AI Cap case; review AI Cap discovery responses; draft emails to team regarding same; continue work on response to emergency motion in AI Cap case.	
1/11/07	Powers, Jason M.	\$200.00	0.50	\$200.00	0.50	Review injunction application.	
1/12/07	Lipe, Guy	\$4,500.00	10.00	\$2,700.00	6.00	Continue work on response to AI Cap motion for contempt order, sequestration order, and injunctive relief; research background of Roland Fox regarding same; review email from Ken Kaplan regarding depositions; draft proposed email to Ken Kaplan regarding depositions; exchange emails with Roland Fox regarding deposition issues; telephone conference with Roland Fox, Andy Derman, Duncan Grant, and Jason Powers regarding AI Cap emergency motion; continue work on response to AI Cap motion for contempt order, sequestration order, and injunctive relief;	[witness]; draft email to
1/12/07	Powers, Jason M.	\$1,400.00	3.50	\$1,400.00	3.50	draft email to Ken Kaplan regarding same; telephone conferences with Duncan Grant's office regarding filing of deposition notices; continue work on response to AI Cap motion for contempt order, sequestration order, and preliminary injunction.	
1/13/07	Lipe, Guy	\$2,925.00	6.50	\$2,925.00	6.50	Prepare for and participate in telephone conference with opposing counsel regarding outstanding discovery issues; follow-up telephone conference with Roland Fox, Duncan Grant, and Guy Lipe.	
1/15/07	Lipe, Guy	\$6,750.00	15.00	\$6,750.00	15.00	Review documents produced by AI Cap; prepare summary of key documents produced by AI Cap; prepare for depositions; continue work on preliminary response to AI Cap motion for contempt, for sequestration order, and for injunctive relief.	
1/15/07	Powers, Jason M.	\$2,300.00	5.75	\$2,300.00	5.75	Prepare list of topics for deposition preparation for Manise Bernard; draft email to Roland Fox regarding same; draft email to Andy Derman regarding AI Cap discovery responses; draft email to Ken Kaplan regarding opposition to motion for leave to present rebuttal expert; telephone conference with David Kaeuper regarding deposition dates and preparation; draft email to Roland Fox regarding same; draft email to Ken Kaplan regarding same; continue work on preliminary response to AI Cap's motion for contempt order, sequestration order, and preliminary injunction; review email from Ken Kaplan regarding modified proposal for extension of rebuttal expert deadline; exchange emails with Duncan Grant regarding same; draft email to Ken Kaplan regarding same; continue work on preliminary response to AI Cap motion for contempt order, sequestration order, and injunctive relief.	
1/15/07	Powers, Jason M.	\$2,300.00	5.75	\$2,300.00	5.75	Confer with Guy Lipe regarding discovery disputes; begin drafting court submission regarding discovery disputes.	
1/16/07	Gong, Miranda-Lin S.	\$71.25	0.25	\$71.25	0.25	Become apprised of new tasks to complete concerning discovery.	
1/16/07	Lipe, Guy	\$6,750.00	15.00	\$6,525.00	14.50	Continue work on preliminary response to motion for contempt order, sequestration order, and injunctive relief; draft email to Roland Fox regarding same; exchange emails with Duncan Grant and Jason Powers regarding same; draft email to Ken Kaplan regarding David Kaeuper deposition; draft email to Roland Fox regarding discovery submission in AI Capcase; review comments on first draft of preliminary response to AI Cap emergency motion; prepare second draft of same; draft email to Roland Fox regarding second draft of preliminary response to AI Cap emergency motion.	
1/16/07	Mayer, Walter R.	\$87.50	0.25	\$87.50	0.25	Review joint discovery letter.	
1/16/07	Powers, Jason M.	\$3,000.00	7.50	\$3,000.00	7.50	Telephone conference with Brian Wrathmell and Clara Beuth regarding discovery progress and related issues; organize potential production documents for review; confer with Guy Lipe regarding Delaware discovery hearing; collect documents and prepare for hearing.	

Fees Vinson Elkins

1/17/07	Lipe, Guy	\$2,250.00	5.00	\$1,125.00	2.50	Continue work on discovery submissions and preliminary response to Al Cap emergency motion; prepare for hearings and Delaware federal court; telephone conferences with Roland Fox regarding discovery submission and preliminary response to Al Cap emergency motion; telephone conferences with Duncan Grant regarding discovery issues and discovery submission and revisions to and filing of preliminary response to Al Cap emergency motion. [separate matter]
1/17/07	Lipe, Guy	\$2,250.00	5.00	\$1,125.00	2.50	Prepare for hearings [separate matter] and federal court proceedings in transit to Delaware.
1/17/07	Lipe, Guy	\$900.00	2.00	\$450.00	1.00	Review Al Cap discovery submission; conferences with Duncan Grant, Jason Powers, and Andy Derman regarding discovery issues, Al Cap's discovery submission, and preparation for hearings.
1/17/07	Nunnally, Knox	\$325.00	0.50	\$325.00	0.50	Review drafts of prepared pleadings and case issues.
1/17/07	Powers, Jason M.	\$5,000.00	12.50	\$2,500.00	6.25	Revise discovery letter to Judge Robinson; coordinate review of potential production items; prepare for discovery hearing; travel to Wilmington for discovery hearing.
1/18/07	Gong, Miranda Lin S.	\$71.25	0.25	\$71.25	0.25	Become apprised of case status and issues.
1/18/07	Lipe, Guy	\$4,950.00	11.00	\$2,475.00	5.50	Prepare for hearings [separate matter] and Delaware federal court; conferences with Duncan Grant, Andy Derman, and Jason Powers regarding same; telephone conferences with Roland Fox regarding preparation for same; attend and participate in hearings [separate matter] and Delaware federal court; conferences with Duncan Grant, Jason Powers, and Andy Derman regarding same; telephone conference with Roland Fox regarding outcome of hearing and schedule going forward.
1/18/07	Lipe, Guy	\$2,700.00	6.00	\$1,350.00	3.00	Return to Houston from Delaware hearings.
1/18/07	Powers, Jason M.	\$5,700.00	14.25	\$2,800.00	7.00	[separate matter]; prepare for and attend status and discovery conference in Delaware federal court; return to Houston.
1/19/07	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Review proposed order from Ken Kaplan and accompanying email; draft email to Roland Fox regarding same.
1/22/07	Lipe, Guy	\$5,400.00	12.00	\$900.00	2.00	Review email notification of orders signed by Judge Robinson denying emergency motions; exchange emails with Duncan Grant regarding same; prepare revised draft of briefing order; exchange emails with Duncan Grant regarding same; exchange emails with Jason Powers regarding discovery [separate matter]; exchange emails with Roland Fox regarding briefing issues in Delaware federal court case; [separate matter]; draft email to Ken Kaplan regarding proposed order on briefing issues; exchange emails with Duncan Grant and Jason Powers regarding same; finalize and transmit email to Ken Kaplan regarding briefing order; review rebuttal expert report from Al Cap; draft email to Roland Fox regarding same;
1/22/07	Powers, Jason M.	\$1,700.00	4.25	\$800.00	2.00	[separate matter]; revise and finalize draft opposition; draft email to Roland Fox regarding same.
1/23/07	Lipe, Guy	\$5,400.00	12.00	\$2,700.00	6.00	[separate matter]; confer with team regarding discovery stay and related issues; review and comment on stipulation regarding briefing; organize production documents for filing.
1/23/07	Powers, Jason M.	\$400.00	1.00	\$400.00	1.00	review email and proposed revised briefing order; draft email to Roland Fox regarding same; draft opening brief in support of motion for judgment on the pleadings. [separate matter]; review email from Ken Kaplan regarding briefing order; [separate matter]; review email from Ken Kaplan regarding briefing order; draft opening brief in support of motion for judgment on the pleadings.
						Review draft pleadings; confer with team regarding discovery suspension and prepare confirming correspondence regarding same.

## Fees Vinson Elkins

1/24/07	Lipe, Guy	\$5,625.00	12.50	\$5,400.00	12.00	Exchange emails with Roland Fox regarding arguments made by Al Cap at January 18 discovery conference; exchange emails with Roland Fox regarding brief in support of motion for judgment on the pleadings; exchange emails with Duncan Grant, Jim Carignan, and Jason Powers regarding order on briefing schedule in federal Delaware case [separate matter]; prepare revised draft of federal court order and draft email to Ken Kaplan regarding same; exchange emails with Roland Fox, Andy Derman, Duncan Grant, and Jason Powers regarding same; transmit email to Ken Kaplan regarding same; continue work on opening brief in support of motion for judgment on the pleadings; draft email to Roland Fox regarding draft opening brief in support of motion for judgment on the pleadings.
1/24/07	Powers, Jason M.	\$400.00	1.00	\$200.00	0.50	[separate matter]; review correspondence and draft stipulations on briefing and dismissal.
1/25/07	Lipe, Guy	\$5,400.00	12.00	\$5,175.00	11.50	Exchange emails with Roland Fox regarding arguments made by Al Cap at January 18 discovery conference; exchange emails with Roland Fox regarding brief in support of motion for judgment on the pleadings; exchange emails with Duncan Grant, Jim Carignan, and Jason Powers regarding order on briefing schedule in federal Delaware case [separate matter]; prepare revised draft of federal court order and draft email to Ken Kaplan regarding same; exchange emails with Roland Fox, Andy Derman, Duncan Grant, and Jason Powers regarding same; transmit email to Ken Kaplan regarding same; continue work on opening brief in support of motion for judgment on the pleadings; draft email to Roland Fox regarding draft opening brief in support of motion for judgment on the pleadings.
1/25/07	Powers, Jason M.	\$1,300.00	3.25	\$800.00	2.00	Review and edit draft briefs on motion for judgment on pleadings; correspond with opposing counsel regarding discovery issues.
1/26/07	Lipe, Guy	\$675.00	1.50	\$450.00	1.00	Telephone conference with Roland Fox regarding opening brief in support of motion for judgment on the pleadings; make final revisions to opening brief; draft emails to Duncan Grant regarding filing of opening brief and briefing order; Duncan Grant regarding filing of opening brief in federal court case and status of negotiations regarding stipulation of dismissal.
1/30/07	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Review order approving stipulation; draft email to Roland Fox regarding same.
1/31/07	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Telephone conference with Roland Fox regarding status of briefing order and anticipated schedule; telephone conference with Duncan Grant regarding status of proposed briefing order; review letter from Al Cap's counsel to Judge Robinson regarding proposed briefing order; draft email to Roland Fox regarding same.
2/8/07	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Telephone conference with Jason Powers regarding attorney's fee application.
2/9/07	Lipe, Guy	\$112.50	0.25	\$112.50	0.25	Review briefing order; draft email to Roland Fox regarding same.
2/12/07	Lipe, Guy	\$675.00	1.50	\$675.00	1.50	Review Al-Cap Answer Brief on FISA and non-monetary obligations issues; begin preparation of comments on same.
2/12/07	Powers, Jason M.	\$300.00	0.75	\$300.00	0.75	Review Al-Cap motions papers in Delaware federal court.
2/13/07	Lipe, Guy	\$3,150.00	7.00	\$3,150.00	7.00	Review Al Cap brief; prepare comments on same; begin work on reply brief; exchange emails with Duncan Grant and Jim Carignan regarding Delaware law issues; continue work on reply brief.
2/14/07	Lipe, Guy	\$4,500.00	10.00	\$4,500.00	10.00	Continue work on reply brief.
2/15/07	Lipe, Guy	\$4,500.00	10.00	\$4,500.00	10.00	Continue work on reply brief; complete first draft of reply brief; draft email to Roland Fox and Andy Derman regarding same.
2/15/07	Nunnally, Knox	\$325.00	0.50	\$325.00	0.50	Review draft pleadings in progress.
2/19/07	Lipe, Guy	\$4,275.00	9.50	\$4,275.00	9.50	Review comments on draft brief from Duncan Grant and Andy Derman; work on revised draft of reply brief and perform additional research relating to same; finalize revised draft of reply brief and draft email to Roland Fox and Andy Derman regarding same; telephone conference with Andy Derman regarding same.
2/20/07	Lipe, Guy	\$1,800.00	4.00	\$1,800.00	4.00	Telephone conference with Roland Fox regarding comments on reply brief; prepare revised version of reply brief.
2/21/07	Lipe, Guy	\$900.00	2.00	\$900.00	2.00	Finalize and attend to filing of reply brief in Delaware; telephone conferences and email exchanges with Duncan Grant regarding same.
2/27/07	Lipe, Guy	\$225.00	0.50	\$225.00	0.50	Exchange emails with Andy Derman regarding issues relating to Al Cap settlement with the Congo; exchange emails with Walter Mayer regarding same; draft email to Ken Kaplan regarding rejection of proposal for joint stipulation for dismissal with parties bearing their own costs.
3/9/07	Powers, Jason M.	\$400.00	1.00	\$400.00	1.00	Telephone conferences and correspondence with Guy Lipe, Walter Mayer, Duncan Grant, and Andrew Melisheimer regarding attorney's fee claim in Delaware federal case.
3/12/07	Powers, Jason M.	\$600.00	1.50	\$600.00	1.50	Review Detweiler letter to court on Fantasy Shipping case; review case; confer with Jim Carignan on response; draft language for response; revise Carignan draft.
3/13/07	Powers, Jason M.	\$400.00	1.00	\$400.00	1.00	Begin research on issues regarding right to attorney's fees under Delaware law.

Fees Vinson Elkins

3/14/07	Powers, Jason M.	\$1,900.00	4.75	\$1,900.00	4.75	Continue research on Delaware fee claim.
3/15/07	Powers, Jason M.	\$300.00	0.75	\$300.00	0.75	Continue research on Delaware fee claim.
3/16/07	Powers, Jason M.	\$1,400.00	3.50	\$1,400.00	3.50	Continue research; complete initial draft of attorney's fee motion in Delaware action.
3/19/07	Powers, Jason M.	\$300.00	0.75	\$300.00	0.75	Review and revise attorney's fees motion; review research on Delaware fee standards; telephone conference with Andrew Melisheimer regarding documentation of fee claim.
3/21/07	Lipe, Guy	\$2,700.00	6.00	\$2,700.00	6.00	Prepare opening brief in support of motion for attorney's fees and other costs; draft e-mails to Roland Fox and Duncan Grant regarding same.
		\$ 339,853.75	839.00	\$284,707.50	711.00	
		<b>RATE SUMMARY</b>				
	TKPR Name	2005	2006	2007		
	Knox Nurnally	\$600/hr	\$650/hr	\$650/hr		
	Guy Lipe	\$425/hr	\$450/hr	\$450/hr		
	Jason Powers	\$325/hr	\$350/hr	\$400/hr		
	Dan Hinde	\$340/hr	\$375/hr	\$425/hr		
	Walter Mayer	\$270/hr	\$315/hr	\$350/hr		
	Miranda-Lin Gong	N/A	\$240/hr	\$285/hr		
	Leslie Felton	\$95/hr	\$105/hr	\$110/hr		
	Tina Johnson	\$70/hr	\$75/hr	\$80/hr		

**Exhibit 2**



## Expenses Vinson Elkins

Date	TKPR Name	Cost Code	Amt Billed	Narrative
9/12/06	Lipe, Guy	AIR	\$ 978.65	VENDOR: AMEX INVOICE#: CON256592 DATE: 9/19/2006 Tkt#:0057632492331-10/08/06-CONTINENTAL AIRLINES-IAH/Washington DC/IAH-Travel to Washington, DC to meet with Roland Fox, Duncan Grant, [potential witness].
11/21/06	Lipe, Guy	AIR	\$ 7,534.00	CON267038 12/15/2006 Tkt#:0057634494721-11/26/06-CONTINENTAL AIRLINES-IAH/London, UK roundtrip-Travel to London for Roland Fox's deposition
12/1/06	Lipe, Guy	AIR	\$ 860.19	CON267048 12/15/2006 Tkt#:0057634893544-12/04/06-CONTINENTAL AIRLINES-IAH/LGA/IAH-Travel to New York to meet with client and [potential witness].
12/5/06	Lipe, Guy	AIR	\$ 25.00	CON267048 12/15/2006 Tkt#:0052602356016-12/04/06-CONTINENTAL AIRLINES-flight change fee-Travel to New York to meet with client and [potential witness].
1/16/07	Lipe, Guy	AIR	\$ 367.15	VENDOR: AMEX INVOICE#: CON271687 DATE: 2/13/2007 Tkt#:0057636147613-01/17/07-CONTINENTAL AIRLINES-IAH/Philadelphia, PA/IAH-Attend hearings in Delaware.
1/16/07	Powers, Jason M.	AIR	\$ 150.93	VENDOR: AMEX INVOICE#: CON271874 DATE: 2/14/2007 Tkt#:0057636147658-01/18/07-CONTINENTAL AIRLINES-Houston/Philadelphia-Attend Status and Discovery Conference in Delaware Federal Court
1/18/07	Lipe, Guy	AIR	\$ 153.18	VENDOR: AMEX INVOICE#: CON271687 DATE: 2/13/2007 Tkt#:0057636148022-01/17/07-CONTINENTAL AIRLINES-Philadelphia, PA/IAH-Attend hearings in Delaware.
1/18/07	Lipe, Guy	AIR	\$ (216.23)	VENDOR: AMEX INVOICE#: CON271687 DATE: 2/13/2007 Tkt#:0057636147613-01/17/07-CONTINENTAL AIRLINES-credit for unused portion of ticket-Attend hearings in Delaware.
1/18/07	Powers, Jason M.	AIR	\$ 153.18	VENDOR: AMEX INVOICE#: CON271874 DATE: 2/14/2007 Tkt#:0057636148023-01/18/07-CONTINENTAL AIRLINES-Philadelphia/Houston-Attend Status and Discovery Conference in Delaware Federal Court
9/12/06	Lipe, Guy	AIRAF	\$ 35.00	VENDOR: Frosch International Travel Inc INVOICE#: 491437 DATE: 9/22/2006 Lipe/Guy TKT #-7632492331 9/12/2006 Continental Airlines IAH/DCA/IAH
11/21/06	Lipe, Guy	AIRAF	\$ 35.00	Frosch International Travel Inc INV#: 491515 12/1/2006 Lipe/Guy TKT #-7634494721 11/21/2006 Continental Airlines IAH/LGW/IAH
12/1/06	Lipe, Guy	AIRAF	\$ 35.00	Frosch International Travel Inc INV#: 491516 12/8/2006 Lipe/Guy TKT #-7634893544 12/1/2006 Continental Airlines IAH/LGA/IAH
1/16/07	Lipe, Guy	AIRAF	\$ 17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Lipe/Guy TKT #-7636147617 1/16/2007 Continental Airlines IAH/DCA/IAH

## Expenses Vinson Elkins

1/16/07	Lipe, Guy	AIRAF	\$	17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Lipe/Guy TKT #-7636147613 1/16/2007 Continental Airlines IAH/PHL/IAH
1/16/07	Powers, Jason M.	AIRAF	\$	17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Powers/Jason TKT #-7636147659 1/16/2007 USAir PHL/IAH
1/16/07	Powers, Jason M.	AIRAF	\$	17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Powers/Jason TKT #-7636147658 1/16/2007 Continental Airlines IAH/PHL
1/18/07	Lipe, Guy	AIRAF	\$	17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Lipe/Guy TKT #-7636148022 1/18/2007 Continental Airlines PHL/IAH
1/18/07	Powers, Jason M.	AIRAF	\$	17.50	VENDOR: Frosch International Travel Inc INVOICE#: 491558 DATE: 1/26/2007 Powers/Jason TKT #-7636148023 1/18/2007 Continental Airlines PHL/IAH
			\$	10,216.05	<b>TOTAL OF AIR &amp; AIRAF</b>
12/12/05	Lipe, Guy	CLR	\$	1,101.22	CMS200-29000-000607-
12/8/05	Lipe, Guy	CLR	\$	9.39	CMS200-29000-000607-
12/12/05	Lipe, Guy	CLR	\$	7.40	CMS200-29000-000607-
1/4/06	Lipe, Guy	CLR	\$	28.27	CMS200-29000-000607-
7/27/06	Lipe, Guy	CLR	\$	406.38	CMS200-29000-000607-
7/28/06	Hinde, Daniel E.	CLR	\$	153.95	CMS200-29000-001693-
7/31/06	Hinde, Daniel E.	CLR	\$	829.34	CMS200-29000-001693-
8/1/06	Hinde, Daniel E.	CLR	\$	206.29	CMS200-29000-001693-
8/2/06	Hinde, Daniel E.	CLR	\$	221.65	CMS200-29000-001693-
8/2/06	Hinde, Daniel E.	CLR	\$	7.98	CMS200-29000-001693-
8/3/06	Hinde, Daniel E.	CLR	\$	47.33	CMS200-29000-001693-
2/13/07	Lipe, Guy	CLR	\$	794.37	CMS200-29000-000607-
2/14/07	Lipe, Guy	CLR	\$	842.25	CMS200-29000-000607-
2/15/07	Lipe, Guy	CLR	\$	53.32	CMS200-29000-000607-
			\$	4,709.14	<b>TOTAL FOR CLR &amp; CLRW</b>
8/9/06	Powers, Jason M.	DEL4	\$	25.55	FEDEX - Inv. 117293263 MR. M. DUNCAN GRANT WILMINGTON DE 08/09/06 Track# 707542444600



## Expenses Vinson Elkins

11/10/06	Powers, Jason M.	DEL4	\$	87.81	FEDEX - Inv. 852615745 DUNCAN GRANT WILMINGTON DE 11/10/06 Track# 838542794260
11/17/06	Lipe, Guy	DEL4	\$	32.32	FEDEX - Inv. 853710587 [potential witness]
11/17/06	Lipe, Guy	DEL4	\$	110.26	11/17/06 Track# 707542465388
					FEDEX - Inv. 801220165 ROLAND FOX LONDON 11/17/06 Track# 903109125618
11/27/06	Powers, Jason M.	DEL4	\$	20.54	FEDEX - Inv. 855268568 MR. M. DUNCAN GRANT WILMINGTON DE 11/27/06 Track# 903109127426
11/27/06	Powers, Jason M.	DEL4	\$	20.54	FEDEX - Inv. 855268568 KENNETH P. KAPLAN WASHINGTON DC 11/27/06 Track# 903109127404
11/28/06	Powers, Jason M.	DEL4	\$	19.26	FEDEX - Inv. 855506472 MR. KENNETH P. KAPLAN WASHINGTON DC 11/28/06 Track# 903109127735
11/28/06	Powers, Jason M.	DEL4	\$	19.26	FEDEX - Inv. 855506472 MR. M. DUNCAN GRANT WILMINGTON DE 11/28/06 Track# 903109127746
1/8/07	Powers, Jason M.	DEL4	\$	13.58	FEDEX - Inv. 862797854 M. DUNCAN GRANT WILMINGTON DE 01/08/07 Track# 707542473353
1/8/07	Powers, Jason M.	DEL4	\$	13.58	FEDEX - Inv. 862797854 KENNETH P. KAPLAN WASHINGTON DC 01/08/07 Track# 707542473364
			\$	362.70	<b>TOTAL FOR DEL4</b>
10/8/06	Lipe, Guy	HOTEL	\$	372.13	VENDOR: AMEX INVOICE#: CON259815 DATE: 10/17/2006 -Other Hotel-Washington-Travel to Washington, DC to meet with client and [potential witness].
10/9/06	Lipe, Guy	HOTEL	\$	372.13	VENDOR: AMEX INVOICE#: CON259815 DATE: 10/17/2006 -Other Hotel-Washington-Travel to Washington, DC to meet with client and [potential witness].
12/5/06	Lipe, Guy	HOTEL	\$	727.97	CON267048 12/15/2006 -Omni Hotels-New York-Travel to New York to meet with client and [potential witness].
1/17/07	Lipe, Guy	HOTEL	\$	125.95	VENDOR: AMEX INVOICE#: CON271687 DATE: 2/13/2007 -Other Hotel-Wilmington-Attend hearings in Delaware.
			\$	1,598.18	<b>TOTAL FOR HOTEL</b>
			\$	16,886.07	<b>TOTAL AMOUNT</b>

Expenses Vinson Elkins

<b>Index to Cost Codes</b>	
AIR & AIRAF	Travel agency fees
CLR & CLRW	Research Westlaw & Lexis
DEL4	Delivery via Federal Express
HOTEL	Hotel expense reports